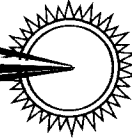
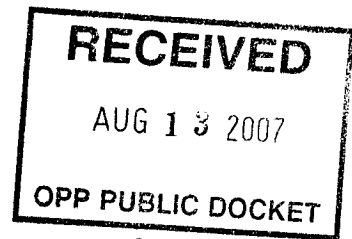


**SUNNYSIDE
VALLEY
IRRIGATION
DISTRICT**



SERVING AGRICULTURE SINCE 1906



8/6/07

August 3, 2007

Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Docket ID number EPA-HQ-OPP-2007-0588

Greetings:

I, the undersigned am District Manager of the Sunnyside Valley Irrigation District (SVID). I represent not only SVID but also the other irrigation districts, ditch companies and the cities and towns which constitute the Sunnyside Division Board of Control (SDBOC) providing irrigation and drainage service for approximately 100,000 acres in the Lower Yakima Valley, Washington.

Aquatic vegetation is a serious problem in the several hundred miles of irrigation systems serving the Sunnyside Division. Chemical control of this vegetation is the most cost effective and environmentally friendly way to control aquatic vegetation.

We have used MAGNACIDE[®] H Herbicide in our irrigation district for more than 25 years. There are virtually no other viable alternatives save for mechanical removal which dramatically elevates turbidity above water quality standards set by the State of Washington.

If we did not have MAGNACIDE[®] H Herbicide available or it was too restrictive to use we would have to return to mechanically controlling our weeds as the other available chemicals will not do the job. Costs would increase to farmers but more importantly, quality of service to them would suffer as would the water quality of water returning to natural water courses.

In over 25 years, we have never found any dead birds, animals, or fish at the point of compliance following a MAGNACIDE[®] H Herbicide application. I am not aware of any crop damage caused by MAGNACIDE[®] H Herbicide when used according to label requirements.

The Sunnyside Division does not supply drinking water. Treated irrigation water does not discharge to a source of drinking water.

August 6, 2007

The Sunnyside Division has a water quality department that routinely conducts "Time of Travel" studies to know the extent and timing of the treatment ensuring it is applied according to label requirements.

We support the re-registration of MAGNACIDE[®] H Herbicide for the continued use in control of aquatic weeds in irrigation facilities.

Sincerely,

A handwritten signature in cursive script, reading "James W. Trull". The signature is fluid and extends to the right.

James W. Trull
District Manager